

LAW OFFICES OF
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June 10, 2011

UPS Overnight
Jeff Oppenheim
1641 3rd Avenue, #24K
New York, NY 10128

Re: Judge Checci's June 6 Court Order
Liafom v. Big Fresh Pictures, D.N.J. 10-00606 (JLL)

Judge Checci Ordered the parties complete the scheduling of depositions and comply with outstanding discovery by June 20, 2011. This obligates you to comply with our discovery request to review the film properties. I attach a review outline and a copy of the Order.

You did not respond for two months then refused two weeks notice to "prepare."* Only the Court can impose conditions or quash discovery. I am determined to see the Court's Order complied with. I propose 10AM to 6 PM on June 16th and 17th.

Final Frame
150 West 22nd Street, 3rd Floor
New York, NY 10011

If we do not agree on other days, and you do not show, I will file for sanctions, legal costs and expenses over the past three months within 24 hours. Please respond by Monday by telephone, reply email or fax. Slower forms of communication will undermine the Court's Order.

Sincerely,



Michael M. Cohen

cc: Hon. Justice Hose Linares, USDJ
Hon. Justice Claire C. Cecchi, USMJ
Dennis A. Cipriano, Esq.

MMC/xaj

* Regarding your complaint that by certified letter of my May 2nd letter was postmarked May 11th. Yes it was apparent and not a device. I regret the exception. You received email as well.

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Regarding the Review.

1. We have notified you of a Manhattan location.
2. We will have a technician recommended by the facility. He will advise on the tapes.
3. We will rent a tape deck that can forward at speeds 25X plus.
4. We will separate tapes by the way they were shot. Those shot from a fixed position and those from a handheld.
5. We will screen the tapes shot fixed first. Stopping for you to identify persons by name and show that you have their release. We will note the name and description of the person. For those that you cannot identify in "short order" we will simply note we await your determination.
6. We will then look at the tapes shot in motion. We anticipate mostly in fast forward. We do not anticipate a need to check more than a few releases for persons appearing on those tapes.
7. We will look at the condition of the footage in the hard drives. We anticipate mostly in fast forward. We do not anticipate a need to check more than a few releases for persons appearing on those tapes.
8. We will work 10 to 6 each day, with 1 hour for lunch. The facility opens at 10 AM.
9. In the unlikely event we require another day, absent your agreement, I will ask the Court for another day.